

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:

MARLENYS FERNANDEZ BATISTA,

Debtor

Bankruptcy No. 24-10321-PMM

Chapter 13

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

MARLENYS FERNANDEZ BATISTA, Debtor, has filed a Motion to Avoid Judgment Lien of Cavalry SPV I LLC with the Court.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant relief sought in the motion or if you want the court to consider your views on the motion, then **on or before January 3, 2025**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court  
Gateway Building  
201 Penn Street, Suite 400  
Reading PA 19601  
Phone: 610-208-5040

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Stephen M. Otto, Esquire  
Cornerstone Law Firm LLC  
8500 Allentown Pike  
Blandon, PA 19510  
Phone: 484-220-0481

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **Thursday, January 16, 2025 at 11:00 A.M.** in Courtroom 4th Fl, United States Bankruptcy Court, The Gateway Building, 201 Penn St, Reading, Pennsylvania 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Date: December 13, 2024

By: /s/Stephen M. Otto  
Stephen M. Otto, Esq.  
8500 Allentown Pike, Suite 3  
Blandon, PA 19510  
610-926-7875  
PA. I.D. No. 82463  
steve@cornerstonelaw.us